

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

NORMAN TODD,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO. 2:07-cv-149-MEF
)	
CITY OF CLANTON, et al.,)	
)	
Defendants.)	

MOTION FOR EXTENSION OF DEADLINE

COMES NOW the Plaintiff Norman Todd (hereinafter referred to as the Plaintiff), by and through undersigned counsel, and files this Motion for Extension of Deadline in the above-entitled action. In support hereof, the Plaintiff would show unto this Honorable Court the following:

1. On February 21, 2007, Defendants filed a Motion to Dismiss [Doc# 2] in this action and Plaintiff filed response to said Motion to Dismiss. On September 19, 2007 this Court Ordered that the Motion to Dismiss would be treated by the Court as a Motion for Summary Judgment. In said Order [Doc #11] this Court further established a deadline of September 24, 2007 for the filing of evidentiary materials or legal argument pertinent to the Motion.

2. Undersigned counsel for the Plaintiff respectfully submits to this Court that due to the reason set out in his Objection to Order filed simultaneously herewith, as well as his pre-existing court schedule, as set out below (and the preparation time required for same) additional time above the five days allocated is necessary for the preparation of response to the Motion to Dismiss/Motion for Summary Judgment on behalf of the Plaintiff. Counsel's trial schedule is as follows:

A) Monday, September 24, 2007 - Case Number CC-2006-1170, Parole Hearing

- B) Tuesday, September 25, 2007 - Case Number TR-07-4837.38, Elmore County District Court - Hearing
- C) Thursday, September 27, 2007 - Case Number DC-06-258, Circuit Court of Elmore County - Trial
- D) Monday October 1, 2007, Case Number CC-07-0274-TSM - Montgomery County Circuit Court Jury Trial (1 - 1 ½ days)
- E) Monday October 1, 2007, Case Number CV-2006-900108-EWR - Montgomery County Circuit Court Jury Trial (1 Day).

3. That, based upon the above stated reasons, Counsel respectfully Moves this Court for an extension of deadline to file Plaintiff's Summary Judgment response.

WHEREFORE, THE PREMISES CONSIDERED, the Plaintiff Moves this Honorable Court to grant this Motion for Extension of Deadline for filing legal argument in opposition to the Motion to Dismiss/Motion for Summary Judgment in this cause.

Respectfully submitted,

/S/Donald G. Madison
DONALD G. MADISON (MAD008)
Attorney for Plaintiff Norman Todd
418 Scott Street
Montgomery, Alabama 36104
Telephone (334) 263-4800
Facsimile (334) 265-8511
E-Mail dgmadison@bellsouth.net
btjarvis1@bellsouth.net

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed and that a copy of same will be electronically served upon the following parties on this the 21st day of September, 2007.

James W. Porter, II, Esquire
Porter, Porter & Hassinger
Post Office Box 128
Birmingham, Alabama 35201-0128
Email: jwporders@pphlaw.net

Natalie Ann Daugherty
Porter, Porter & Hassinger
215 21st Street North
Suite 1000
Post Office Box 128
Birmingham, Alabama 35203
Email: ndaugherty@pphlaw.net

/S/Donald G. Madison
OF COUNSEL